

DONALD L. WILKERSON #5730  
Attorney at Law

P.O. Box 42  
Laupahoehoe, Hawaii 96764  
Telephone: (808) 533-4447

Attorney for Defendant Kaulana Freitas

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 19-00099 DKW
	)	
Plaintiff,	)	NOTICE OF MOTION; 1 <sup>st</sup>
	)	AMENDED MOTION FOR
VS.	)	WITHDRAWAL AND
	)	SUBSTITUTION OF COUNSEL;
KAULANA FREITAS,	)	DECLARATION OF
	)	WITHDRAWING CJA COUNSEL
Defendant.	)	DONALD L. WILKERSON;
	)	CERTIFICATE OF SERVICE

\_\_\_\_\_)

**NOTICE OF MOTION**

TO: MARK INCIONG  
Assistant U.S. Attorney  
PJKK Federal Building  
300 Ala Moana Blvd., Room #6100  
Honolulu, Hawaii 96850  
mark.inciong@usdoj.gov

PLEASE TAKE NOTICE that the foregoing Motion will be heard by the  
Honorable Kenneth J. Mansfield, in his courtroom in the United States Courthouse,  
300 Ala Moana Boulevard, Honolulu, Hawaii, on \_\_\_\_\_,

or as soon thereafter as counsel may be heard.

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DONALD L. WILKERSON

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 19-00099 DKW
	)	
Plaintiff,	)	1 <sup>ST</sup> AMENDED MOTION FOR
	)	WITHDRAWAL AND
	)	SUBSTITUTION OF COUNSEL
vs.	)	
	)	
KAULANA FREITAS,	)	
	)	
Defendant,	)	
_____	)	

**1<sup>ST</sup> AMENDED MOTION FOR WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL**

COMES NOW DONALD L. WILKERSON, CJA panel attorney, and hereby moves to withdraw as CJA counsel for Defendant KAULANA FREITAS, and have substitute CJA counsel appointed.

This motion is made pursuant to Defendant's request and is supported by the accompanying declaration of withdrawing CJA counsel DONALD L. WILKERSON.

Dated: Honolulu, Hawaii, September 28, 2021.

\_\_\_\_\_  
DONALD L. WILKERSON  
Withdrawing CJA Counsel

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 19-00099 DKW
	)	
Plaintiff,	)	DECLARATION OF
	)	WITHDRAWING
	)	CJA COUNSEL DONALD L.
vs.	)	WILKERSON
	)	
KAULANA FREITAS,	)	
	)	
Defendant.	)	
_____	)	

**DECLARATION OF WITHDRAWING CJA COUNSEL DONALD L. WILKERSON**

I, DONALD L. WILKERSON, declare:

1. I am licensed to practice before all of the Courts in the State of Hawaii, and I am the Attorney of record for KAULANA FREITAS.
2. Defendant has requested that Declarant withdraw from his case and that new counsel be appointed.
3. Therefore, Declarant respectfully requests that his Motion to Withdraw and Substitute CJA Counsel be granted.
4. I declare under penalty of law that the foregoing is true and correct.

DATED: Honolulu, Hawaii, September 28, 2021.

\_\_\_\_\_  
DONALD L. WILKERSON  
Withdrawing CJA Counsel

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 19-00099 DKW
	)	
Plaintiff,	)	CERTIFICATE OF SERVICE
	)	
vs.	)	
	)	
KAULANA FREITAS,	)	
	)	
Defendant.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the attached document  
was delivered to the following named parties at the time of filing by electronic  
filing:

Mark Inciong  
Assistant U.S. Attorney  
P.J.K.K. Federal Building  
300 Ala Moana Boulevard, Room #6100  
Honolulu, Hawaii 96850  
mark.inciong@usdoj.gov

Dated: Honolulu, Hawaii, September 28, 2021.

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DONALD L. WILKERSON